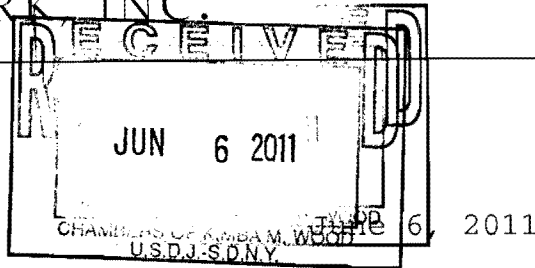


# Federal Defenders OF NEW YORK, INC.

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John J. Byrnes  
Acting Executive Director



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DATE FILED: 6/7/11

**BY HAND**

Honorable Kimba M. Wood  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Julian Heicklen**  
**10 Cr. 1154 (KMW)**

**MEMO ENDORSED**

Hon. Judge Wood:

This letter responds to the Court's April 28, 2011 Order that the Federal Defenders send a letter to the Court explaining Mr. Heicklen's absence from his April 28<sup>th</sup> Court appearance and the Court's May 24<sup>th</sup> Order modifying the motion schedule set on April 28<sup>th</sup> 2011.

As to the first issue, Mr. Heicklen has provided me with no intelligible explanation for his absence at the April 28<sup>th</sup> court appearance.

Having conferred with Mr. Heicklen we respectfully request that the Court allow him to withdraw the pro se motion he filed on April 29, 2011 and instate a motion schedule. Furthermore, we ask the Court for a six week extension of the June 29, 2011 motion schedule. We request an extension of the motion schedule as we need additional time for the briefing and as we are in the process of arranging with an outside firm for the firm to submit additional motions as amicus counsel on behalf of Mr. Heicklen.

If the Court approves this request, defense motions would be due on August 10, 2011. The government's response would be due by October 10, 2011. Defendant's reply would be due by October 21, 2011. I have spoken to AUSA Mermelstein, and she has no objection to this request.

*Granted.  
KMW*

*Granted  
KMW*

Honorable Kimba M. Wood  
June 6, 2011  
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If Mr. Heicklen wishes to make a motion regarding this matter, we will so advise the Court.

Respectfully submitted,

SPS (13)

Sabrina P. Shroff  
Assistant Federal Defender

cc: Mr. Julian Heicklen  
Rebecca G. Mermelstein, AUSA

6-7-11  
SO ORDERED: N.Y., N.Y.

Kimba M. Wood  
KIMBA M. WOOD  
U.S.D.J.

The Clerk's office is directed to docket this letter as withdrawing Mr. Heicklen's April 29, 2011 pro se motion, docket entry #13.